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In the Matter of:)	
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Petition of Neutral Tandem, Inc. for)	
Interconnection with Verizon Wireless,)	WC Docket No. 06-159
Inc. Pursuant to Sections 201(a) and)	
332(c)(1)(B) of the Communications Act of)	
1934, as Amended)	

I. INTRODUCTION

1

by Neutral Tandem, therefore, unquestionably serves the public interest and, as demonstrated in the Petition, Verizon Wireless has no legitimate justification for refusing to interconnect with Neutral Tandem. Accordingly, the Commission should grant Neutral Tandem's Petition.

II. BACKGROUND

Integra is a facilities-based competitive local exchange carrier ("CLEC") headquartered in Portland, Oregon. Integra provides service through its operating subsidiaries, primarily to small and medium-sized businesses, in eight states: Arizona, California, Idaho, Minnesota, North Dakota, Oregon, Utah, and Washington. Integra employs approximately 1,000 people across its operating territories and, with its recent acquisition of Electric Lightwave, LLC, will have annual revenue in excess of \$300 million. Integra is a customer of Neutral Tandem and uses Neutral Tandem's independent transit services to terminate traffic to other CLECs, wireless carriers, and other service providers.

III. COMMENTS

Under 47 U.S.C. § 201(a),¹ the Commission must determine whether the direct connections requested by Neutral Tandem are "necessary or desirable in the public interest." In this case, the requested interconnection clearly furthers the public interest.

The requested interconnection would provide a competitive alternative to the incumbent LECs' historic stranglehold on tandem services for

¹ Hereinafter "Section 201(a)."

delivering traffic to one of the largest wireless providers in the United States. It is beyond debate that, in general, competition yields significant public benefits such as lower prices, lowered barriers to entry, and increased network efficiency. As stated in the Petition, those general benefits of competition would apply in this case. Specifically, Integra and its customers would benefit from having a choice of routes, and the resulting competitive prices, for delivering traffic to Verizon Wireless through a provider that Integra currently uses.

Moreover, the Petition demonstrates that an additional termination route to Verizon Wireless would enhance the public switched telephone network by increasing network reliability, diversity, homeland security, and disaster recovery. Independent tandem services such as those provided by Neutral Tandem are especially important to alleviate incumbent LEC tandem exhaust and call blocking due to tandem over capacity. Therefore, as illustrated in the Petition, the public benefits of the interconnection requested by Neutral Tandem are substantial and meet the criteria in Section 201(a).

Verizon Wireless will be hard pressed to articulate a legitimate reason for denying Neutral Tandem's request to interconnect. After all, as stated in the Petition, it is rational for Verizon Wireless to interconnect with Neutral Tandem because the interconnection would result in, *inter alia*, desirable network redundancy for Verizon Wireless without any additional cost to

Verizon Wireless.² Therefore, not only does the requested interconnection serve the public interest, it serves Verizon Wireless' own interest.

In fact, the Petition begs the question of the motivation behind Verizon Wireless' refusal to interconnect. At its core, this dispute is about competition and whether carriers, including competitive LECs, wireless carriers, and cable companies will have a viable alternative to the incumbent LECs' tandem services. As shown in the Petition, Verizon Wireless has an incentive to refuse to interconnect with Neutral Tandem. Verizon Wireless' incumbent LEC parent company has taken the position that Neutral Tandem cannot resell transit services to deliver traffic to Verizon Wireless in territories where Verizon is the incumbent LEC.³ By refusing to interconnect directly with Neutral Tandem, Verizon Wireless, along with its incumbent LEC parent, is executing a squeeze play to maintain a monopoly on tandem services. This anti-competitive conduct is especially apparent when viewed in conjunction with other efforts to stifle alternative tandem services that are currently pending before the Commission.⁴

Section 201(a) specifically authorizes the Commission to order carriers to establish direct connections with other carriers. Indeed, the obligation to interconnect in Section 201(a) is one of the foundations of the modern

² Petition at 3, 5.

³ Petition at 5.

⁴ See Neutral Tandem, Inc.'s Reply Comments in Support of Time Warner Cable's Petition for Declaratory Ruling, *In the Matter of Petition of Time Warner Cable for Declaratory Ruling that Competitive Local Exchange Carriers May Obtain Interconnection Under Section 251 of the Communications Act of 1934, as Amended, to Provide Wholesale Telecommunications Services to VoIP Providers*, WC Docket No. 06-55.

telecommunications network. It encourages facilities-based competition and provides numerous benefits to consumers.

Given the clear mandate in Section 201(a) and the significant public policy benefits associated with the establishment of direct connections between Neutral Tandem and Verizon Wireless, one of the country's largest wireless service providers, Integra Telecom urges the Commission to grant the relief requested by Neutral Tandem in the Petition.

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INTEGRA TELECOM

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